54-009-00002



Harold G. Strohmeyer **Environmental Control** 740-283-5148

July 14, 2006

Judith M. Katz, Director Air Protection Division 3AP00 USEPA, Region III 1650 Arch Street Philadelphia, Pa. 19103-2029

John Benedict WV Department of Environmental Protection Division of Air Quality 601 57th Street Charleston, WV 25304

Dear Ms. Katz and Mr. Bennedict:

FOLLANSBEE PERMIT NO. INITIAL NOTIFICATION OF DIESEL POWERED GENERATOR

Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Engines. Section 63.6590 (b) provides for submission of only an Initial Notification foe RICE subject to limited requirements. 40 CFR §§63.6645(d) provides guidance on submitting the initial notification. There are two attachments included with this letter, the first contains the required information, the second the required certification. This diesel engine operates as emergency generator when commercial power is interrupted. I apologize for the late submission of this notification

Should you have any questions please direct them to me at the telephone number provided.

Sincerely,

Harold G. Strohmeyer

Wheeling-Pittsburgh Steel Corporation

cc: B. Smith/ecmf/3.2.3.2.5.

Wilbur Winland

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Protection Division (3AP12)

Mountain State Carbon LLC July 14, 2006 Attachment 1

§ 63.9 Notification requirements.

- b) Initial notifications.
- (2) The owner or operator of an affected source that has an initial startup before the effective date of a relevant standard under this part shall notify the Administrator in writing that the source is subject to the relevant standard. The notification, which shall be submitted not later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the following information:
- (i) The name and address of the owner or operator;
 Owner: Mountain State Carbon LLC, 1134 Market Street, Wheeling, WV 26003
- (ii) The address (i.e., physical location) of the affected source; Follansbee Plant, WV State Route 2, Follansbee, WV 26037
- (iii) An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines; Final Rule 40 CFR Part 63 Subpart ZZZZ. Limited only to the initial notification requirement by §63.6590 (b), due to the new engine driven generator being used for emergency operations.

(iv) A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted;

The source is a 527 horsepower Kohler diesel powered generator model 350REOZV. Diesel fuel is combusted by the engine with the fume released through the exhaust system to the atmosphere. The hazardous air pollutants reported to be emitted are 1,1,2,2-tetrachloroethane, 1,3-butadiene, 2,2,4-trimethylpentane, acetaldehyde, acrolein, benzene, chlorobenzene, chloroethane, ethylbenzene, formaldehyde, methanol, methylene chloride, n-hexane, naphthalene, polycyclic aromatic hydrocarbons, polycyclic organic matter, styrene, tetrachloroethane, toluene, and xylene. Metallic HAP from distillate oil fired stationary RICE that have been measured are: cadmium, chromium, lead, manganese, mercury, nickel, and selenium.

(v) A statement of whether the affected source is a major source or an area source. The affected source is a major source.

Mountain State Carbon LLC July 14, 2006 Attachment 2

Certification of Data Accuracy

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached <u>Initial Notification required</u> by 40 CFR §§63.6645(d), and any supporting documents appended hereto, is true, accurate, and complete.

Signature: William Willam Date: 7/18/06

Name and Title: <u>Wilbur Winland</u>, <u>President and Chief Operating Officer Mountain State Carbon LLC</u>.

Telephone number: <u>740-283-5640</u>, Fax number: <u>304-234-5635</u>